



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 26, 2013

**BY HAND**  
**UNDER SEAL**

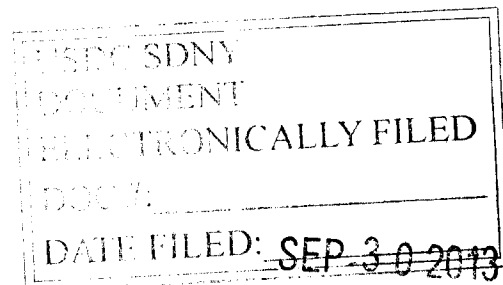
The Honorable Debra Freeman  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Joseph Manuel Hunter, et al.,**  
**13 Cr. 521**

Dear Judge Freeman:

On July 17, 2013, indictment 13 Cr. 521, was returned by a grand jury sitting in this District and filed under seal (the "Indictment"). The Indictment charges defendants Joseph Manuel Hunter, Timothy Vamvakias, Dennis Gogel, Michael Filter, and Slawomir Soborski with one count of conspiring to import cocaine and to distribute cocaine knowing and intending that it would be imported to the United States, in violation of Title 21, United States Code, Sections 952, 959, and 963.

Yesterday, September 25, 2013, Vamvakias and Gogel were arrested in Liberia and were subsequently expelled by Liberian authorities. Earlier today, we requested that the Indictment be unsealed for the limited purpose of wheeling it out to a District Judge and otherwise be maintained under seal until further Order of the Court. Vamvakias and Gogel have now arrived in New York and will be presented on the above charges this evening.



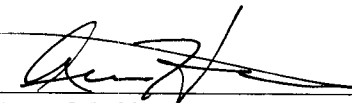
Accordingly, we respectfully request that the above-referenced Indictment (13 Cr. 521) be unsealed in advance of the presentment of Vamvakias and Gogel, but be redacted to remove any and all references to defendant Joseph Manuel Hunter, for the following reasons.

Defendant Joseph Manuel Hunter (a United States citizen), is currently in custody in Thailand. We expect Hunter to be transferred to the custody of United States law enforcement later today and to arrive in New York tomorrow. We have been advised by United States officials, who are themselves directly interacting with Thai officials, that unsealing charges against Hunter before he is deported from Thailand could make it substantially more difficult to quickly obtain custody over him. Accordingly, we intend for the Indictment to remain sealed with respect to Hunter, in order to help ensure the ability of the United States to quickly take custody of him. A proposed redacted Indictment, to be used at the presentments of Vamvakias and Gogel, is attached hereto.

Respectfully submitted,

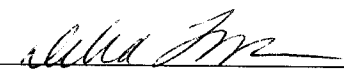
PREET BHARARA  
United States Attorney for the  
Southern District of New York

By:

  
\_\_\_\_\_  
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*granted. In addition, the unredacted version of the Indictment shall be sealed.*

So Ordered:

*9/26/13*   
\_\_\_\_\_  
Hon. Debra Freeman  
United States Magistrate Judge